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January 25, 2023

VIA ECF

Honorable Jesse M. Furman United States District Court Southern District of New York 40 Foley Square New York, NY 10007 Application GRANTED. Further extensions are unlikely to be granted. The Clerk of Court is directed to terminate ECF No. 34.

and Am

January 25, 2023

Re: Vigliotti v. Manhattan Times, Inc., 1:22-cv-05895-JMF

Dear Judge Furman:

We represent Plaintiff Gregg Vigliotti in the above-captioned case. We write pursuant to section 1.F of the Court's Individual Rules and Practices to respectfully request a 30-day extension of time for the parties to file the dismissal papers.

- 1) the original deadline to re-open case is January 28, 2023 [Dkt. No. 32]
- (2) there have been no previous requests for extension of the present deadline;
- (3) no previous requests were granted or denied;
- (4) despite best efforts, the parties were unable to consummate the transaction by the original deadline of January 28, 2023.
 - (5) Defendant Manhattan Times Inc. consents to the requested relief.
- (6) there are no scheduled appearances or other existing deadlines. before the Court as well as any other existing deadlines.

Respectfully Submitted,

s/jameshfreeman/ James H. Freeman

Counsel for Plaintiff